

DOCKET
04-AFC-1
DATE <i>9/24/04</i>
RECD. SEP 27 2004

SAN FRANCISCO ELECTRIC RELIABILITY PROJECT (04-AFC-1)

DATA RESPONSE, SET 1A

(Further Responses to Data Requests: CARE-1.1 through CARE-1.4)

Submitted by
CITY AND COUNTY OF SAN FRANCISCO

September 24, 2004



CH2MHILL

2485 Natomas Park Drive, Suite 600
Sacramento, California 95833-2937

**SAN FRANCISCO ELECTRIC RELIABILITY PROJECT
(04-AFC-1)
CARE DATA RESPONSES, SET 1A**

DATA REQUEST

CARE 1.1

- a. Why is CCSF making the false claim that this project is needed for "reliability"?
- b. Provide in electronic format where available all data and/or documents that CCSF has provided to or received from ISO, CEC, CPUC, and/or other agencies or organizations during the period commencing with the date of the Application being filed through today relating to the Application for Certification for this Project, in regards to the need for this project in order to serve "reliability" demands as determined by the ISO, and/or in order to shut down the Bay View Hunters Point power plant as soon as possible as determined by the plant's owner PG&E.
- c. Identify all persons responsible for developing policies, strategies, comments and/or testimony.

Response:

Response prepared by Karen Kubick

City incorporates by reference herein its objections filed on August 19, 2004 to Data Request 1.1 and the City's response to Data Request 1.1 submitted to CARE on September 7, 2004. Consistent with and without waiving said objections, the City is providing with these responses further documents that are being mailed to CARE, SFCP, Mr. Sarvey and the CEC on September 24, 2004. The City will provide copies of these documents to other parties upon request. The City has undertaken a reasonable search of its records and files and has located no further documents beyond those provided with this response that are responsive to this request.

CARE 1.2

- a. Why is CCSF supporting the siting of three peakers at the Mirant Potrero site over the environmentally benign alternative of transmission upgrades, as proposed by PG&E?
- b. Provide in electronic format where available communications and/or documents relating to this project and the Application of Pacific Gas and Electric Company (U-39-E) for a certificate of Public Convenience and Necessity Authorizing the Construction of the Jefferson-Martin 230 kV Transmission Project, or other transmission projects, that CCSF identified as necessary to meet the reliability demands established by ISO for San Francisco, and to shutdown the Bay View Hunters Point power plant.
- c. Identify all persons responsible for developing policies, strategies, comments and/or testimony.

**SAN FRANCISCO ELECTRIC RELIABILITY PROJECT
(04-AFC-1)
CARE DATA RESPONSES, SET 1**

Response:

Response prepared by Karen Kubick

City incorporates by reference herein its objections filed on August 19, 2004 to Data Request 1.2 and the City's response to Data Request 1.2 submitted to CARE on September 7, 2004. Consistent with and without waiving said objections, the City is providing with these responses further documents that are being mailed to CARE, SFCP, Mr. Sarvey and the CEC on September 24, 2004. The City will provide copies of these documents to other parties upon request. The City has undertaken a reasonable search of its records and files and has located no further documents beyond those provided with this response that are responsive to this request.

CARE 1.3

- a. On November 6, 2001, San Francisco voters overwhelmingly approved a landmark \$100 million bond initiative that pays for solar panels, energy efficiency and wind turbines for public facilities. What if any of the \$100 million bond has been sold, and what expenditures of these funds have been made?
- b. Provide in electronic format where available all communications and/or documents relating to any new renewable energy projects in San Francisco California that CCSF has identified.
- c. Identify and provide the last known address for all persons responsible for, or who participated in, any such communications.

Response:

Prepared by Edward Smeloff

City incorporates by reference herein its objections filed on August 19, 2004 to Data Request 1.3 and the City's response to Data Request 1.3 submitted to CARE on September 7, 2004. City again notes its objection that this data request which requests "*all communication and/or documents relating to any new renewable energy project in San Francisco that CCSF has identified,*" is overly broad, burdensome, unclear, and seeks documents that are not relevant to this proceeding or likely to lead to relevant data or information. Consistent with and without waiving said objections, the City is providing with these further responses, documents related to the San Francisco Southeast Cogeneration Facility. These documents are being mailed to CARE, SFCP, Mr. Sarvey and the CEC on September 24, 2004. The City will provide copies of the documents to other parties upon request. City has now provided to CARE key documents associated with the new renewable projects underway or under consideration in the City.

CARE 1.4

- a. Section 501 of the federal New Source Review states, "The term 'major source' means any stationary source (or any group of stationary sources located within a contiguous area and under common control)".

**SAN FRANCISCO ELECTRIC RELIABILITY PROJECT
(04-AFC-1)
CARE DATA RESPONSES, SET 1**

Why doesn't CCSF's analysis include Mirant's Unit 7 combined cycle project AFC that is on hold not withdrawn and therefore should include an existing Mirant application as required by NSR? Why doesn't CCSF's analysis include the two existing peakers and all other available Mirant units at the proposed project site as NSR requires?

- b. Provide in electronic format where available all communications and/or documents analyzing or evaluating the impacts of the proposed project including the impacts of existing generation, and other new generation under consideration in San Francisco, with those of PG&E's likely transmission upgrades, on air quality, biological resources, water resources, natural gas supplies and energy efficiency.
- c. Identify and provide the last known address for all persons responsible for, or who participated in, any such communications.

Response:

Prepared by Karen Kubick

City incorporates by reference herein its objections filed on August 19, 2004 to Data Request 1.4 and the City's response to Data Request 1.4 submitted to CARE on September 7. Consistent with and without waiving said objections, the City is providing with these responses further documents that are being mailed to CARE, SFCP, Mr. Sarvey and the CEC on September 24, 2004. The City will provide copies of these documents to other parties upon request. The City has undertaken a reasonable search of its records and files and has located no further documents beyond those provided with this response that are responsive to this request.

Energy Resources Conservation
and Development Commission

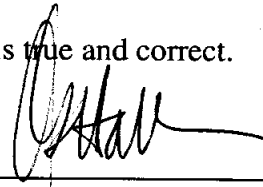
Application for Certification for the)
SAN FRANCISCO ELECTRIC RELIABILITY)
PROJECT (SFERP))
_____)

Docket No. 04-AFC-1

PROOF OF SERVICE

I, ARLENE G. HALL, declare that on September 24, 2004, I deposited copies of the attached
DATA RESPONSE, SET 1A, in the United States mail in San Francisco, California, with first-
class postage thereon fully prepaid and addressed to all parties on the attached service list.

I declare under the penalty of perjury that the foregoing is true and correct.



ARLENE G. HALL

SERVICE LIST

04-AFC-1

DOCKET UNIT

Send the original signed document plus 12 copies to the following address:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 01-AFC-17
DOCKET UNIT, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

In addition to the documents sent to the Commission Docket Unit, also send individual copies of all documents to:

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Energy Resources Conservation
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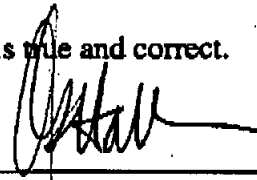
Application for Certification for the
SAN FRANCISCO ELECTRIC RELIABILITY
PROJECT (SFERP)

)
) Docket No. 04-AFC-1
)
)

PROOF OF SERVICE

I, ARLENE G. HALL, declare that on September 24, 2004, I deposited copies of the attached
DATA RESPONSE, SET 1A, in the United States mail in San Francisco, California, with first-
class postage thereon fully prepaid and addressed to all parties on the attached service list.

I declare under the penalty of perjury that the foregoing is true and correct.



ARLENE G. HALL



CALIFORNIA
ENERGY
COMMISSION

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ELECTRONIC PROOF OF SERVICE LIST

Revised 9-15-04

SAN FRANCISCO ELECTRIC RELIABILITY PROJECT
APPLICATION FOR CERTIFICATION,
DOCKET NO. 04-AFC-1

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I declare that I transmitted the foregoing document via e-mail, or as indicated by first class postal mail, to the above named on the date indicated thereby. I declare under penalty of perjury that the foregoing is true and correct.

Sarah Madams
CH2M HILL

Please note that attachments to San Francisco Reliability Project Data Response, Set 1A (Further Responses to Data Requests: CARE – 1.1 through - 1.4 can be viewed at the Docket Unit at the California Energy Commission